

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of

Constellation, LLC, Carlyle PanAmSat I,  
LLC, Carlyle PanAmSat II, LLC, PEP  
PAS, LLC, and PEOP PAS, LLC,  
*Transferors,*

and

Intelsat Holdings, Ltd.,  
*Transferee,*

Consolidated Application for Authority to  
Transfer Control of PanAmSat Licensee  
Corp. and PanAmSat H-2 Licensee Corp.

IB Docket No. 05-290

DA No. 05-2715

File Nos. SAT-T/C-20050930-00193  
SAT-T/C-20050930-00194  
SAT-T/C-20050930-01356  
SAT-T/C-20050930-01357  
SAT-T/C-20050930-01371

**COMMENTS OF INTEGRAL SYSTEMS INC.**

The above-captioned application (the “Application”) seeks the Commission’s consent to transfer control to Intelsat Holdings, Ltd. (“Intelsat”) of licenses held by two subsidiaries of PanAmSat Holding Corporation (“PanAmSat”).<sup>1</sup> Integral Systems, Inc. (“Integral Systems”) hereby comments in support of the Application.

Founded in 1982, Integral Systems is a leading provider of satellite ground systems and has supported over 190 different satellite missions for communications, science, meteorological and earth resource applications. Integral Systems offers an

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<sup>1</sup> See Public Notice, *Constellation, LLC, Carlyle PanAmSat I, LLC, Carlyle PanAmSat II, LLC, PEP PAS, LLC, and PEOP PAS, LLC, Transferors, and Intelsat Holdings, Ltd., Transferee, Seek FCC Consent to Transfer Control of Licenses and Authorizations Held by PanAmSat Licensee Corp. and PanAmSat H-2 Licensee Corp.*, IB Docket No. 05-290, DA 05-2715 (Oct. 14, 2005).

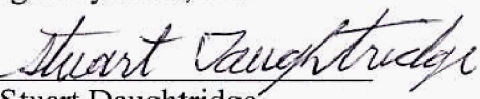
integrated suite of commercial off the shelf software products for satellite command & control, the EPOCH IPS product line. EPOCH IPS has become a world market leader in commercial applications with successful installations on 5 continents. PanAmSat has awarded contracts to Integral Systems for the delivery of a satellite command and control system for the consolidation of PanAmSat's satellite operations.

Integral Systems supports a grant of the Application. The satellite business is intensely competitive. Satellite operators must compete with domestic and regional satellite systems, global satellite systems, and wired and unwired terrestrial systems. These competitors include some of the largest corporations in the world. A merger between PanAmSat and Intelsat will generate tremendous efficiencies, making for a stronger company that is better positioned to operate in this competitive environment.

In view of the foregoing, Integral Systems urges the Commission to grant the Application.

Respectfully submitted,

Integral Systems, Inc.

by   
Stuart Daughtridge

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November 30, 2005

## **CERTIFICATE OF SERVICE**

I, Albert Alderete, do hereby certify that on this 30<sup>th</sup> day of November, 2005, I sent, via electronic mail, a true and correct copy of the foregoing Comments filed by Integral Systems, Inc. to the following:

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